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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 ROBERT GUY RUSSELL,
15 Defendant.

Case No. 2:20-cr-00059-APG-DJA

**STIPULATION TO CONTINUE
SENTENCING**
(Tenth Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
17 United States Attorney, and Simon F. Kung, Assistant United States Attorney, counsel for the
18 United States of America, and Rene L. Valladares, Federal Public Defender, and Brian Pugh,
19 Assistant Federal Public Defender, counsel for Robert Guy Russell, that the Sentencing Hearing
20 currently scheduled on September 20, 2022 at 2:30 p.m., be vacated and continued to a date and
21 time convenient to the Court, but no sooner than sixty (60) days.

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1 This Stipulation is entered into for the following reasons:

- 2 1. The AUSA assigned to this case is leaving the Department of Justice for
3 private practice and will no longer be with the US Attorney's Office at the
4 time of sentencing. The government needs to appoint another AUSA to
5 handle Mr. Russell's sentencing.
- 6 2. The defense and the government are attempting to negotiate an agreed upon
7 recommended sentence for this Court. The parties need additional time to
8 pursue such an agreement.
- 9 3. Defendant is not incarcerated and does not object to a continuance.
- 10 4. This continuance is not sought for the purposes of delay.
- 11 5. The parties agree to the continuance.

12 This is the tenth request for continuance filed herein.

13 DATED this 8th day of September 2022

14 RENE L. VALLADARES
15 Federal Public Defender

JASON M. FRIERSON
United States Attorney

16 By /s/ Brian Pugh

17 BRIAN PUGH
18 Assistant Federal Public Defender

By /s/ Simon F. Kung

SIMON F. KUNG
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ROBERT GUY RUSSELL,


7 Defendant.

Case No. 2:20-cr-00059-APG-DJA

ORDER

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10 Based on the Stipulation of counsel and good cause appearing,
11 IT IS THEREFORE ORDERED that the Sentencing Hearing currently scheduled on
12 September 20, 2022 at the hour of 2:30 p.m., be vacated and continued to January 12, 2023
13 at the hour of 1:30 p.m. in Courtroom 6C.

14 DATED this 9th day of September 2022.

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17 UNITED STATES DISTRICT JUDGE